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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

ADAM MATOT,

Plaintiff,

v.

CH, a minor; BRITTANY FREESE a/k/a
BRITTANY HILL, parent of minor CH;
GARY HILL, parent of minor CH; and DOES
1 and 2,

Defendants.

Case No.: 6:13-cv-0153-TC

DECLARATION OF COUNSEL IN
SUPPORT OF PLAINTIFF'S OPPOSITION
TO DEFENDANT'S MOTION TO DISMISS

Under penalty of perjury, I, Carl D. Crowell, hereby state as follows:

1. I am an attorney admitted to practice in Oregon and plaintiff's counsel in this matter.
2. All matters in this declaration are submitted through personal knowledge and belief.
3. This declaration is in support of Plaintiff's Opposition to Defendant's Motion to Dismiss.

Exhibit 1 is a true and correct copy of the Facebook page created by defendants using a fraudulent and unauthorized Facebook account. Exhibit 1 has been heavily redacted to block the identity and images of the seventy (70+) "friends" who are largely believed to be other

middle school students. On page 2 of Exhibit 1, the phrase “I FUCKED A MONKEY” is written below an image of the plaintiff, presented as being attributed to plaintiff.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: July 23, 2013.

/s/ Carl D. Crowell

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